

Richard S. Mills, Esq. (RM-0206)  
 John P. Cookson, Esq. (JPC-9391)  
 McElroy, Deutsch, Mulvaney & Carpenter, LLP  
 Wall Street Plaza  
 88 Pine Street, 24<sup>th</sup> Floor  
 New York, New York 10005  
 (212) 483-9490  
*Attorneys for Defendant  
 Moody's Holdings, Inc.*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION	21 MC 102 (AKH)
ALCIBAR YUMBLA (AND WIFE, ROSA ORTIZ)	INDEX NO.: 07-CV-01729 (AKH)
Plaintiffs,  -against-  90 CHURCH STREET LIMITED PARTNERSHIP, ET. AL.,	<b>NOTICE OF ADOPTION OF MOODY'S    HOLDINGS, INC.'S ANSWER  <u>TO MASTER COMPLAINT</u></b>  <b>ELECTRONICALLY FILED</b>
Defendants.	

PLEASE TAKE NOTICE that Defendant, MOODY'S HOLDINGS, INC., by its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, as and for its Response to the allegations set forth in the Amended Complaint by Adoption (Amended Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Answer to Master Complaint dated August 2, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, MOODY'S HOLDINGS, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
September 10, 2008

Yours etc.,

McElroy, Deutsch, Mulvaney & Carpenter, LLP  
*Attorneys for Defendant*  
*Moody's Holdings, Inc.*

By: s/ John P. Cookson  
Richard S. Mills (RM-0206)  
John P. Cookson (JPC-9391)  
Wall Street Plaza  
88 Pine Street, 24<sup>th</sup> Floor  
New York, New York 10005  
(212) 483.9490

TO: Worby Groner Edelman & Napoli Bern, LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(212) 267.3700

Gregory J. Cannata, Esq.  
Robert A. Grochow, Esq.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 553.9206

James E. Tyrrell, Jr., Esq.  
Patton Boggs LLP  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 848.5600

Thomas A. Egan, Esq.  
Fleming Zulack Williamson Zauderer, LLP  
One Liberty Plaza  
New York, New York 10006-1404  
(212) 412.9500

**CERTIFICATION OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of September 2008, I electronically filed the foregoing NOTICE OF ADOPTION OF ANSWER BY DEFENDANT MOODY'S HOLDINGS, INC., with the Clerk of the Court using the CM/ECF System which sends notification to appearing parties.

McElroy, Deutsch, Mulvaney & Carpenter LLP

By: s/ John P. Cookson

Richard S. Mills (RM-0206)

John P. Cookson (JPC-9391)

*Attorneys for Defendant*

*Moody's Holdings, Inc.*

Wall Street Plaza

88 Pine Street, 24<sup>th</sup> Floor

New York, New York 10005

(212) 483-9490